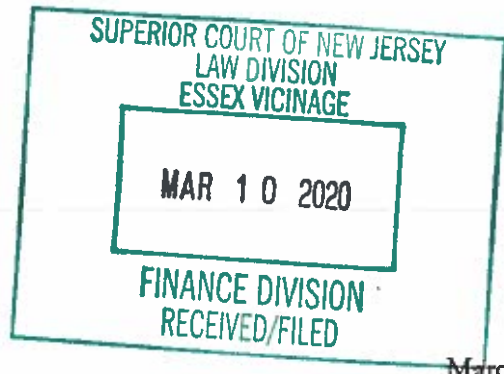


Essex County Superior Court
Veterans Courthouse—Civil Division
50 West Market Street
Newark, NJ 07105



March 5, 2020

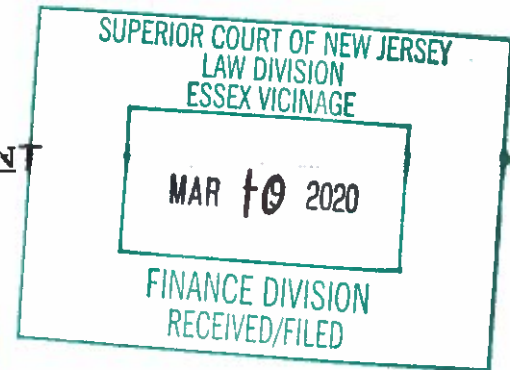
Ross W. Brown
C/o Essex County Correctional Facility
354 Doremus Avenue
Newark, NJ 07105

Ross W. Brown

V.

Essex County Dept. of Corrections;
CFG Group; Dr. O'Connor; Dr.
Annicette; Sgt. Guido; Sgt. Langley;
Warden Anderson; Warden Cirillo

AMMENDED COMPLAINT
CIVIL ACTION: 44920



JURISDICTION AND VENUE

1. This is a civil action authorized by 42 U.S.C. Section 1983 to redress the deprivation, under color of state law of rights secured by the Constitution of the United States. The court has jurisdiction under 28 U.S.C. Section 1331 and 1343(a) (3). Plaintiff R. Brown seeks declaratory relief pursuant to 28 U.S.C. Section 2201 and 2202. Plaintiff R. Brown's claims for injunctive relief are authorized by 28 U.S.C. Section 2283 and 2284 and Rule 65 of Federal Rules of Civil Procedure.

PLAINTIFFS

2. Plaintiff Ross W. Brown is and was at all-time herein a prisoner of the County of Essex in the custody of the Essex County Dept. of Corrections. He is currently confined to ECDOC in Newark, NJ.

DEFENDANTS

3. Defendant Warden Anderson is the warden of ECDOC. He is legally responsible for the operation and welfare of all inmates of that jail.
4. Defendant Warden Cirillo is the warden of ECDOC. He is legally responsible for the operation and welfare of all inmates of that jail.
5. Sgt. Guido was the officer assigned to unit 2B1 On 11-28-19 during 6am-2pm shift.
6. Sgt. Langley was the sergeant assigned to unit 2B1 on 11-28-19 during 6am-2pm shift.
7. Dr. O'Connor is the orthopedic surgeon that is employed by CFG Group the jail's only medical provider.

8. Dr. Annicette is the medical director of the CFG Group and responsible for the oversight of all medical concerns.

Exhaustion of Legal Remedies

9. Attached is a list of all grievances and requests submitted with their corresponding numbers.

FACTS

10. On 11/28/2019 all of my commissary possessions were stolen from my room on unit 2B1 room 223.
11. During November of 2019 I was interviewed by Lt. Francis on one occasion regarding criminal activity in unit 2B1.
12. During November of 2019 I was taken to the fourth floor to the internal affairs unit.
13. There, I was interviewed by "Angie" we agreed that I would arrange for the purchase of an illegal smuggled in cell phone from Officer Bray.
14. On 11/28/2019 after I learned that my possessions were stolen, I was informed by inmate: Larry Williams, that inmate: Demon McNeill employed him to steal from me and assault me because I was "working with IA"
15. In unit 2B1 cell 211 I was assaulted.
16. I suffered black eyes, broken nose, torn ACL, and disc damage.
17. Dr. O'Connor informed me that I needed ACL surgery on my right knee, however since the operation costs roughly \$20,000 the jail will not order it to be done.

LEGAL CLAIMS

18. Plaintiff re-allege and incorporate by paragraphs 1-17.
19. Defendant Larry Williams assaulted plaintiff Brown by punching him in the face multiple times. Defendant's action violated plaintiff's rights under 8th amendment of USC and caused plaintiff pain, suffering, physical injury, and emotional distress.
20. By witnessing the defendant's conduct and failing to stop it of. Bray also violated plaintiff's 8th amendment right.
21. The plaintiff has no plain, adequate or complete remedy at law to redress the wrongs described herein. Plaintiff has been and will continue to be irreparably injured by the conduct of the defendants unless this court grants declaratory, monetary, and injunctive relief.
22. Plaintiff seeks premiliminary injunction requiring Dr. O'Connor to order surgery to repair torn ACL.
23. Plaintiff seeks compensatory damages in the amount of \$40,000 and punitive damages in the amount of \$50,000.



Ross W. Brown, Defendant Pro-Se

cc: ESSEX COUNTY VETRANS COURTHOUSE
50 West Market Street,
Newark, NJ 07102